

STATE OF MISSOURI
PUBLIC SERVICE COMMISSION

In the matter of)	
)	
USW Local 11-6,)	GC-2006-0390
)	
and)	
)	
Laclede Gas Company)	

LOCAL 11-6's SUBMISSION OF MARK BOYLE'S DEPOSITION TESTIMONY

COMES NOW USW Local 11-6 ("Local 11-6"), by counsel, and hereby files as surrebuttal the following excerpts from Mark Boyle's deposition testimony to address the issues noted:

1. Laclede's contention that Mark Boyle's testimony implies that the Cellnet installer did not cause the leak.

- a. p. 188 line 12 through p. 191 line 25
- b. p. 208 line 4 through p. 209 line 12
- c. p. 82 lines 16-18

2. Staff's apparent contention that Mark Boyle's testimony was motivated by the upcoming Union election.

- a. p. 32 lines 4-16
- b. p. 36 line 22 through p. 38 line 16
- c. p. 191 line 1 through p. 193 line 3

3. Laclede's contention that Mark Boyle did not follow protocol when investigating the leak.

- a. p. 212 lines 9-21

- b. p. 98 lines 15-24
- c. p. 205 19 through p. 206 line 24
- d. p. 200 lines 7-19
- e. p. 76 lines 4-7
- f. p. 201 lines 3-10
- g. p. 71 line 15 through p. 72 line 1
- h. p. 73 lines 5-9
- i. p. 76 lines 11-19
- j. p. 202 lines 2-24

Note: Contrary to Laclede's contention through Dr. Seamands' Rebuttal Testimony, p. 14 line 21, Mark Boyle never claimed in his affidavit that he evacuated the building.

4. Laclede's contentions regarding the propriety of Mark Boyle's call to Kevin Patterson.

- a. p. 99 line 7 through p. 100 line 4
- b. p. 204 lines 7-22
- c. p. 203 line 12 through p. 204 line 2
- d. p. 118 lines 5-9

5. Laclede's contention that Mark Boyle's time sheets are not accurate.

- a. p. 63 line 24 through p. 64 line 4

6. Laclede's contention that the leaking union should not have been replaced.

- a. p. 110 line 8 through p. 111 line 7
- b. p. 209 line 13 through p. 210 line 16

c. p. 228 line 16 through p. 229 line 2

7. Laclede's contention that Mark Boyle has no knowledge that Laclede is concealing leaks caused by Cellnet installers.

a. p. 214 lines 5-13; p. 215 lines 11-20

b. p. 216 lines 20-24; p. 217 lines 5-10

c. p. 136 lines 14-16; p. 137 lines 6-18

d. p. 138 lines 4-15

e. p. 139 line 25 through p. 140 line 3

8. Laclede's contentions regarding the illness of the customers.

a. p. 86 lines 14-24

b. p. 121 line 25 through p. 122 line 2

c. p. 211 lines 6-19

d. p. 217 lines 11-4; p. 217 line 24 through p. 218 line 18

9. Laclede's contention that the AMR installer was blameless for not following up on the Mrs.'s complaint of a gas odor.

a. p. 210 line 22 through p. 211 line 5

WHEREFORE, Local 11-6 respectfully submits the above excerpts from Mark Boyle's deposition testimony.

Respectfully submitted,

/s/ Sherrie A. Schroder

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Certificate of Service

The undersigned certifies that a true and correct copy of the foregoing was served on January 30, 2007, by United States mail, hand-deliver, email, or facsimile upon:

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